

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHANNON WILLIAMS,
a/k/a Donald Jarmon, a/k/a/ Thumbs,
DESHAWN HERNANDEZ ,
a/k/a Latreise Anderson, and
SARA JARRETT.

Defendants.

8:09CR457

SUPERSEDING INDICTMENT

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)(vii)
18 U.S.C. § 2
18 U.S.C. § 1956(a)(1)(A) and (B)
18 U.S.C. § 1956(h)
21 U.S.C. § 853

The Grand Jury Charges:

COUNT I

From on or about June 6, 2006, to December 14, 2009, in the District of Nebraska and elsewhere, SHANNON WILLIAMS a/k/a Donald Jarmon a/k/a Thumbs, DESHAWN HERNANDEZ a/k/a Latreise Anderson and SARA JARRETT, Defendants herein, knowingly and intentionally, combined, conspired, confederated and agreed with Christopher Parrott, Anthony Parrott, Joe Mark Felix, Vicki Cass, Amy Griffith, Daniel Bouquet, Yvonne Ackerly, Jamie Ackerly, Laura Adler and with other persons, known and unknown to the Grand Jury, to distribute and possess with intent to distribute 1,000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(vii).

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT II

On or about January 1, 2007, through December 19, 2009, in the District of Nebraska and elsewhere, SHANNON WILLIAMS a/k/a Donald Jarmon a/k/a Thumbs, DESHAWN HERNANDEZ a/k/a Latreise Anderson, and SARA JARRETT, Defendants herein, knowingly and intentionally combined, conspired, confederated and agreed with other persons known and unknown to the Grand Jury to commit the following offense against the United States of America: opening bank accounts, withdrawing funds from those accounts, and/or depositing funds into those bank accounts to launder money, knowing that the currency involved in the financial transaction represented the proceeds of some form of unlawful activity, conducted and attempted to conduct such a financial transaction involving the proceeds of specified unlawful activity, that is a conspiracy to distribute marijuana, with the intent to promote the carrying on of the specified unlawful activity, and knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(I) and 1956(a)(1)(B)(I).

In violation of Title 18, United States Code, Section 1956(h) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

As a result of the offenses set forth in Count I, the Defendants, SHANNON WILLIAMS a/k/a Donald Jarmon a/k/a Thumbs and DESHAWN HERNANDEZ a/k/a Latreise Anderson, shall forfeit to the United States any and all property constituting or derived from any proceeds said Defendants obtained directly or indirectly as a result of the violations alleged in Counts I and II, and any and all property used or intended to be used in any manner or part to commit and/or to facilitate the

commission of the violations alleged in Counts I and II of this Superseding Indictment, including but not limited to the following:

A) UNITED STATES CURRENCY:

1) \$1,000.00 in United States currency refunded to Mango Creek account from GBS Partners, Inc.;

2) \$1,000.00 in United States currency converted from a check from Spence Escrow Co. payable to U.S. Department of Treasury for proceeds from escrow account holding monies for Deshawn Hernandez from check number 1004 from Wells Fargo Bank.

3) \$85,120.00 in United States currency seized from safety deposit box at Pinnacle Bank on December 18, 2009.

B) VEHICLE:

1) A 2007 GMC Yukon, VIN 1GKFK13067J129231 registered to Deshawn Hernandez.

C) FINANCIAL ACCOUNTS:

1) \$15,545.95 as proceeds from Pinnacle Bank Account #6912183410 in the name of Mango Creek Properties, Inc.;

2) \$1,445.00 in monies delivered by Deshawn Hernandez on May 27, 2009 and July 6, 2009, now held as evidence at the Omaha Police Department property room.

D) REAL PROPERTY:

1) all right, title and interest Shannon Williams may hold to the real property described as NORTH 91.5 FEET, WEST 28 FEET, LOT 6, IN THE NORTH 91.5 FEET OF LOT 7, BLOCK 4, PARKERS ADDITION, as surveyed, and platted in Douglas County, Nebraska, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 1923 N. 27th Street, Omaha, Nebraska;

2) all right, title and interest Shannon Williams may hold to the real property described as LOT 12, BLOCK 2, HITCHCOCKS 1ST ADDITION, AN ADDITION TO THE CITY OF

OMAHA, as surveyed, platted and recorded in Douglas County, Nebraska commonly known as 3744 Lake Street, Omaha, Nebraska, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 3744 Lake Street, Omaha, Nebraska;

3) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as 3181 PENNINGTON CIR SW, ATL, GA, as surveyed, platted and recorded in Fulton County, Georgia, commonly known as 3181 Pennington Cir. SW, Atlanta, Georgia (titled in the name of E ZONE INVESTMENTS LLC);

4) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as HASTINGS & HEYDENS 3RD ADD LOT 14 BLOCK 0 LOTS 13 & 82X120, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 2444 Browne Street, Omaha, Nebraska;

5) all right, title and interest Shannon Williams may hold to the real property described as FAIRFAX LOT 216 BLOCK 0 40 X 134, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 3721 N. 39th Street, Omaha, Nebraska (titled in the name of MANGO CREEK PROPERTIES INC.);

6) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as MOSSMAN & WILSON ADD LOT 106 BLOCK 0 LOT 106 BLOCK 0, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 2205 N. 39th Street, Omaha, Nebraska;

7) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as WILSON -CARL C-2ND ADD LOT 20 BLOCK 0 42 X 129.2, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 4527 N. 36th Avenue, Omaha, Nebraska (titled in the name of EZONE INVESTMENTS LLC);

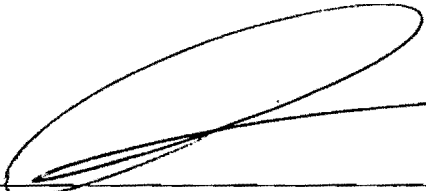
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8) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as FONTENELLE PARK LOT 205 BLOCK 0 40 X 130, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 3916 N. 42nd, Omaha, Nebraska (titled in the name of E ZONE INVESTMENTS LLC);

9) all right, title and interest Deshawn Hernandez and/or Shannon Williams may hold to the real property described as YALE PLACE LOT 49 BLOCK 0 -EX S 5 FT- 40 X 98.2, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 3365 Erksine Street, Omaha, Nebraska; (titled in the name of E ZONE INVESTMENTS LLC);

10) all right, title and interest SHANNON WILLIAMS a/k/a Donald Jarmon a/k/a Thumbs, DESHAWN HERNANDEZ a/k/a Latreise Anderson, and SARA JARRETT may hold to the real property described as THE EAST 34 FEET OF THE NORTH 80 FEET OF LOT 1, BLOCK 35, KOUNTZE PLACE, as surveyed, platted and recorded in Douglas County, Nebraska, commonly known as 1801 Pinkney, Omaha, Nebraska.

In violation of Title 21, United States Code, Section 853.



ROBERT C. STUART
Acting United States Attorney

A TRUE BILL

FOREPERSON

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The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.


MARIA R. MORAN (#17347)
Assistant U.S. Attorney